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May 15, 2017

VIA ECF

Honorable Gregory H. Woods
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

**Re: Correction Officers' Benevolent Association et. al. v.
City of New York, et al. 17 v. 2899 (GHW) (GWG)**

Dear Judge Woods:

We are general counsel to the Correction Officers' Benevolent Association and write on behalf of all Plaintiffs in the above referenced matter regarding Defendant City of New York's ("City") request for a pre-motion conference in advance of its proposed motion to dismiss the Complaint. Plaintiffs consent to the request for a pre motion conference. Pursuant to our discussion earlier today with Alan Schlesinger, Esq., the City has consented to the submission of Plaintiffs' responding pre-motion position statement **by Friday, June 2, 2017**. This time frame is required because the undersigned is occupied with other court deadlines this week and will be out of the office next week, returning only after the Memorial Day Holiday.

We respectfully request the Court approve the parties' agreed upon schedule for submission of Plaintiffs' responding pre-motion position statement.

Respectfully submitted,
KOEHLER & ISAACS LLP

By: /s/ Cynthia Devasia, Esq.
Cynthia Devasia, Esq.

cc: Alan Schlesinger, Esq. (via ECF)

